

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**KELLY MARIE LOCKHART,**  
a/k/a KELLY MARIE WILSON,  
[DOB: 11/05/1978]

Defendant.

No. 14-03061-01-CR-S-MDH

18 U.S.C. § 1028A  
Mandatory Term of 2 Years Imprisonment  
NMT \$250,000 Fine  
NMT 1 Year Supervised Release  
Class E Felony  
\$100 Special Assessment

**I N F O R M A T I O N**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

1. Between approximately February, 2013, and on or about January 17, 2014, the defendant, **KELLY MARIE LOCKHART**, also known as Kelly Marie Wilson, and Stacy Rena Rosa (“Rosa”), also known as Stacy R. Webbe, aiding and abetting one another, devised and executed a scheme to defraud individuals, merchants and financial institutions, and to obtain moneys, funds and other property owned by, and under the custody and control of individuals, merchants and financial institutions by means of false and fraudulent pretenses, representations and promises. The manner and means of this scheme were that the defendant and Rosa used stolen personally identifying information (including individuals’ names, dates of birth, social security numbers, drivers’ license numbers, and bank account information) in order to gain access to the identity theft victims’ bank and credit card accounts via telephone and the Internet, and to open new credit card accounts. The defendant and Rosa obtained unauthorized credit cards issued in the victims’ names, and utilized those cards to purchase merchandise and gift cards, and obtain cash advances. The unauthorized credit cards were sent to the defendant and

Rosa via the United States Postal Service. The defendant's and Rosa's applications for and use of the unauthorized credit cards resulted in numerous interstate wire transmissions. The defendant's and Rosa's scheme resulted in numerous violations of Title 18, United States Code, Sections 1341 (Mail Fraud) and 1343 (Wire Fraud).

2. In order to execute this scheme, on or about April 15, 2013, the defendant and Rosa, aiding and abetting one another, used the personally identifying information of a victim, identified herein as "W.B.," including W.B.'s full name, Bank of America credit card account number, date of birth, social security number, North Carolina driver's license number, and W.B.'s mother's maiden name, in order to impersonate W.B. to access via telephone W.B.'s Bank of America credit card account ending in 4289 to request a secondary Bank of America credit card in the name of Kelly Wilson. As a result, Bank of America issued an unauthorized credit card in the name of Kelly Wilson, drawn on W.B.'s account ending in 4289. On or about April 22, 2013, in Bolivar, Missouri, the defendant utilized the unauthorized Bank of America credit card ending in 4289 to obtain a \$3,600 cash advance, and on or about April 30, 2013, in Buffalo, Missouri, Rosa used the unauthorized Bank of America credit card ending in 4289 to pay \$96 for her visit to a hair salon.

3. Between on or about April 15, 2013 and on or about April 30, 2013, in Dallas County, in the Western District of Missouri, and elsewhere, the defendant, **KELLY MARIE LOCKHART**, knowingly possessed and used, without lawful authority, means of identification of another person, during and in relation to the offenses of Mail Fraud, in violation of Title 18, United States Code, Section 1341, and Wire Fraud, in violation of Title 18, United States Code, Section 1343, namely, W.B.'s full name, Bank of America credit card account number, date of

birth, social security number, North Carolina driver's license number, and W.B.'s mother's maiden name;

All in violation of Title 18, United States Code, Section 1028A(a)(1), and Title 18, United States Code, Section 2.

TAMMY DICKINSON  
United States Attorney

By /s/ Steven Mohlhenrich  
STEVEN M. MOHLHENRICH  
Assistant United States Attorney

DATED: 8/7/2014  
Springfield, Missouri